BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

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Federal Communications Commission
Office of the Secretary

In the Matter of	)	
Advanced Television Systems	)	
And Their Impact upon the	)	MM Docket No. 87-268
Existing Television Broadcast	)	
Service	)	

To: The Commission

COMMENTS OF CHILDREN'S TELEVISION WORKSHOP

Children's Television Workshop ("CTW") hereby responds to the Notice of Proposed Rule Making in the above-captioned proceeding, FCC 91-337 (released November 8, 1991) ("Notice"). As the producer of Sesame Street and other educational children's television programming, CTW wholeheartedly supports the implementation of advanced television ("ATV") in this country, and particularly urges the FCC to continue to facilitate the use of broadcast spectrum for educational purposes as it refines its regulatory approach for ATV.

For more than a decade, CTW has also developed software based on the themes, characters and curricula of its television shows for such other media as personal computers, video game systems, and advanced multimedia systems combining video and audio with computer graphics and interactivity. CTW therefore encourages the selection of an ATV transmission standard which permits, to the greatest possible extent, the integration of broadcast television with these and other video and non-video information sources. The Commission should adopt its proposal to declare that ATV compatibility with other

media, including computer applications as well as non-broadcast video delivery media, is a desirable policy objective. Notice at ¶ 47, pp. 24-25.

DISCUSSION

NTSC receivers are currently used to receive information from a variety of non-broadcast sources. These include remote sources such as cable and satellite, and local sources such as VCRs, videodiscs, cartridge-based video game systems, and compact disc-based multimedia systems. Even without a new broadcast standard, we would anticipate expanded use of the home television receiver in connection with such existing non-broadcast sources, and the development of new sources of similar kinds of information, such as telephone lines or direct broadcast satellites. But by virtue of the central role that television plays in the American family, as well as the increasing attention to the use of technology (including both television and computers) in American schools, the advent of ATV creates a unique opportunity to place a mechanism for high-quality, integrated delivery of valuable educational (and other) products within reach of virtually all

For example, consumers would benefit from the development of applications which access multiple sources of information simultaneously. A family watching the evening news together might want to help the children with a compact disc-based atlas displayed in a "window."[2/]

We also note that, at significant expense, NTSC signals are currently being digitized, compressed and displayed on computer screens. The replacement of NTSC with a digital ATV signal provides an opportunity for the development of more cost-effective means of achieving interoperability.[3/] For this reason, we encourage the Commission to adopt standards which will facilitate the conversion of broadcast material for use on other systems.[4/]

Indeed, all potential producers of ATV programming and software (e.g., video, text, computer software, and multimedia) and potential manufacturers of ATV receivers are likely to need economic incentives to fully exploit the capabilities of the new technology. Compatibility with non-broadcast systems would permit the use of information (particularly graphics and computer code) across a variety of platforms,[5/] thereby easing

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2/ See comments on scalability, COHRS Letter at 2-3.

3/ CTW therefore recommends that the Commission adopt a digital ATV transmission standard.

4/ See comments on interoperability, COHRS Letter at 1-2.

5/ See comments on interoperability and harmonization, COHRS Letter at 1-2, 3.

the financial burden on producers, encouraging their production of ATV product, and fostering earlier achievement of high receiver penetration levels.

CONCLUSION

CTW believes that enhanced, over-the-air broadcast video will make its programming for children more appealing and effective, and thereby further our mission to use television to educate while entertaining young viewers. But by selecting a digital ATV transmission standard and encouraging compatibility with other media, the Commission has the broader opportunity to promote a cost-effective ATV system able to support the integrated mass distribution of a wide variety of products, including, for example, text-based products such as books and magazines, and interactive multimedia products of the sort now delivered only on optical discs. The Commission should formally declare that compatibility with both video and non-video delivery media is a desirable policy objective.

In these comments, Children's Television Workshop has endeavored to support the Commission's efforts to create a forward-looking advanced television system. We agree with the Commission that a broadcast technology should be selected which "will be viable over the long term by permitting the

introduction of future changes and improvements in a timely and non-disruptive manner."6/

Advanced television, appropriately defined, can become the star player in a cohesive technological environment which will serve the American people in a multitude of ways, into the indefinite future. Narrowly defined, ATV itself may soon need to be replaced.

Respectfully submitted,

CHILDREN'S TELEVISION WORKSHOP

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6/ Advanced Television Systems, First Report and Order, 5 FCC Rcd 5627, 5628 (1990).